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Central Valley Regional Water Quality Control Board

1 September 2016

Emma J. Bounds  
Bounds Family Trust  
19621 SE 72<sup>nd</sup> Street  
Oklahoma City, OK 74857

Monte Bounds  
Bounds Family Trust  
33318 Avenue 12  
Madera, CA 93636

***ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2016-0541, EMMA J. BOUNDS,  
AS AN INDIVIDUAL AND AS TRUSTEE FOR THE BOUNDS FAMILY TRUST –  
PROSECUTION TEAMS TRANSMITTAL OF EVIDENCE***

Pursuant to the Hearing Procedure for the above-referenced matter, please find enclosed a list of witnesses the Prosecution Team intends to call at the hearing and a list of evidence with attached exhibits. The Evidence List consists of documents already in the public files of the Central Valley Regional Water Quality Control Board, some of which are being submitted by reference in accordance with the California Code of Regulations, title 23, section 648.3.

The Prosecution Team requests an extension until 9 September 2016 to submit a Declaration from a member of the East San Joaquin Water Quality Coalition. Despite best efforts made by the Prosecution Team to finalize the Declaration prior to the 2 September 2016 deadline, we were unable to do so.

The Prosecution Team has added Terry Bechtel and Wesley Ouimette to the Prosecution Team and witness list to provide additional testimony regarding information about the facility, landowner outreach, and the penalty methodology.

An amended Administrative Civil Liability Complaint is also enclosed. This amended version corrects some discrepancies in the East San Joaquin Water Quality Coalition's farm evaluation-related outreach.

If you have any questions regarding the enclosures, please contact Brett Stevens at (916) 464-4642, or via e-mail at [brett.stevens@waterboards.ca.gov](mailto:brett.stevens@waterboards.ca.gov).

*Original signed by*

SUE Y. MCCONNELL  
Irrigated Lands Program Manager

Enclosures: Amended ACL Complaint R5-2016-0541  
Prosecution Team Witness List  
Prosecution Team Evidence List & Exhibits

cc via email: Pamela Creedon, Central Valley Water Board, Rancho Cordova  
Adam Laputz, Central Valley Water Board, Rancho Cordova  
Rob L'Heureux, Central Valley Water Board, Rancho Cordova  
Susie Loscutoff, Office of Enforcement, SWRCB, Sacramento  
Andrew Deeringer, Office of Chief Counsel, SWRCB, Sacramento  
Parry Klassen, East San Joaquin Water Quality Coalition